

EXHIBIT AA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ESTER LORUSSO,

Plaintiff,

-against-

ALITALIA-LINEE AEREE ITALIANE SpA,

Defendant.

Case No. 07 CV 3583 (LBS)(RLE)

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S SECOND SET OF INTERROGATORIES**

Defendant Alitalia Linee Aeree Italiane SpA ("Alitalia" or "Defendant"), by its attorneys, Vedder, Price, Kaufman & Kammholz, P.C., hereby responds to plaintiff Ester Lorusso's ("Lorusso" or "Plaintiff") Second Set of Interrogatories (the "Interrogatories").

GENERAL OBJECTIONS

The following general objections to the Interrogatories (the "General Objections") apply to and are incorporated in each of the specific responses set forth below:

1 Defendant objects to Plaintiff's Interrogatories to the extent that they seek documents or information already produced as part of Defendant's Initial Disclosures or in response to Plaintiff's previous document requests or interrogatories.

2. Defendant objects to Plaintiff's Interrogatories to the extent that they seek documents or information that are outside the permissible scope of discovery or seek to impose obligations upon Defendant that are greater than or different from those imposed by the Federal Rules of Civil Procedure or this Court's Local Civil Rules (General Instruction numbers 1, 2, 4, 5, 9 and 10).

3. Defendant objects to Plaintiff's Interrogatories to the extent that they seek documents or information "from the date Plaintiff first applied for a position as an employee of Defendant" (General Instruction number 11). Defendant will respond to these Interrogatories, except where otherwise expressly stated, from January 1, 2004 to the present (the "relevant time period").

4. In responding to the Interrogatories, Defendant does not concede and expressly reserves its right to object to the relevance, materiality or admissibility of any of the information sought by the Interrogatories, and does not waive any objection it may be entitled to assert to the relevance, materiality and/or admissibility as evidence or for any other purpose of any such information at any trial, hearing or other proceeding in this action or any other action.

OBJECTIONS TO DEFINITIONS

1. Defendant objects to Definition 2 ("Defendant") as overbroad and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Defendant will respond on behalf of itself and its predecessors only.

2. Defendant objects to Definition 3 ("Employee") as overbroad and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Defendant will respond only with respect to individuals who have been regular employees of Alitalia during the relevant time period, except that Defendant will also respond, if appropriate, with respect to Francesco Gallo, who became a consultant on September 15, 2005.

3. Defendant objects to Definition 5 ("Document") to the extent that that definition deviates in any way from the definition of that term in Local Civil Rule 26.3.

4. Defendant objects to Definition 6 ("Personnel File(s)") as overbroad, vague and ambiguous and not reasonably calculated to lead to the production of admissible evidence. Defendant will produce its official personnel file in response to any request for personnel files as to which it agrees to produce documents.

5. Defendant objects to Definition 8 ("Concerning") to the extent that that definition deviates in any way from the definition of that term in Local Civil Rule 26.3.

SPECIFIC RESPONSES AND OBJECTIONS

INTERROGATORY NO. 1: Please provide information about the number of employees in Alitalia's New York office in 2003, 2004, 2005, 2006 and 2007.

ANSWER TO INTERROGATORY NO. 1:

Defendant objects to this interrogatory on the grounds that it is vague and ambiguous. Defendant further objects to this interrogatory on the grounds of temporal overbreadth, to the extent that it seeks information pertaining to the year 2003. Notwithstanding, subject to and without waiving the foregoing and the General Objections, Defendant refers Plaintiff to the attached Exhibit A and states that the information therein was gleaned from payroll records maintained by Alitalia.

INTERROGATORY NO. 2: Please provide information about the name, age, title, gender and indication of hire and/or termination date of employees in Alitalia's New York office who were hired and/or terminated from 2003 through 2007.

ANSWER TO INTERROGATORY NO. 2:

Defendant objects to this request as duplicative of Plaintiff's First Set of Interrogatories, Interrogatory No. 1, to the extent that it seeks documents reflecting "the name, age, title... and indication of... termination date" of employees in Alitalia's New York office who were terminated from 2004 through 2007. Defendant further objects to this interrogatory on the

grounds of temporal overbreadth, to the extent that it seeks information pertaining to the year 2003. Defendant also objects to this interrogatory as not reasonably calculated to lead to the discovery of relevant or admissible evidence to the extent that it seeks the hire date of employees not hired during the years specified or the termination date of employees not terminated during the years specified. Notwithstanding, subject to and without waiving the foregoing and the General Objections, Defendant refers Plaintiff to its previously-served Responses to Plaintiff's First Set of Interrogatories, Interrogatory No. 1 and to the attached Schedules B and C, and states that the information therein was gleaned from payroll records maintained by Alitalia.

Dated: April 21, 2008

VEDDER, PRICE, KAUFMAN & KAMMHOLZ, P.C.

By: 

Alan M. Koral (AK 1503)

Daniel C. Green (DG 0057)

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Alitalia, Linee Aeree Italiane SpA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ESTER LORUSSO,

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Defendant.

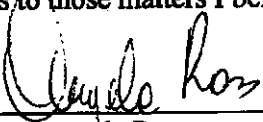
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VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Angela Ross, being duly sworn, deposes and says:

I have, since 1999, served as Manager, Compensation and Benefits for the United States operations of Alitalia Linee Aeree Italiane SpA ("Alitalia"), defendant in the captioned action. I have read the foregoing Response of Alitalia to Plaintiff's Second Set of Interrogatories and know the contents thereof, and the same are true to my own knowledge except as to those matters stated upon information and belief, and as to those matters I believe them to be true.



Angela Ross

Sworn to and subscribed before me
This 22 day of April 2008



Notary Public

DOMINICK CHULLI
Notary Public, State of New York
No. 30-4782738-Nassau County
Commission Expires Dec. 31, 2009

Schedule A: Number of Employees in Alitalia's New York Office	
DATE	NUMBER OF EMPLOYEES
December 31, 2003	130
December 31, 2004	111
December 31, 2005	75
December 31, 2006	58
December 31, 2007	48

**Schedule B: Name and Sex
of Employees Terminated
in Alitalia's New York Office
Between January 1, 2004
and December 31, 2007**

NAME	SEX
ANGRISANI, K.	F
ANTONELLE, L.	F
AURICCHIO, M.	F
BACKSTROM, P.	M
BENTIVEGNA, V.	F
BERTOLOTI, L.	M
BESCHLOSS, M.	F
BONANNO, I.	F
BOULOS, S.	F
BRTALIK, G.	M
BRUNO, M.	M
CARNAZZA, C.	F
CASCIANO, B.	F
CERRATI, J.	M
CHILLEM, T.	F
CIMINO, I.	F
CODIGLIA, A.	F
COLUCCI, M.	M
CORBANESE, A.	M
DAGRI, G.	M
DE BITETTO, P.	F
DE NITTO, C.	F
DI CLEMENTE, S.	F
DI GIOVANNA, F.	M
DI GIROLAMO, L.	M
D'ORO, O.	M
FALCO, M.	M
FAVANO, S.	M
FERRARA, V.	M
FERRO, J.	M
IORE, A.	F
FONTANILLA, R.	M
GADALETA, C.	M
GALLO, F.	M
GARGIULO, G.	M
GASPARRO, M.	M
GICALA, M.	F
GIOVANNELLI, A.M.	F
GLICKSON, R.	F
GRIGOLO, P.	F
GRUPPUSO, F.	F
GUIDOTTI, P.	M
GUPTA, A.	F
HELD, D.	M
KRANJAC, E.	F
LA CENERE, A.	F
LAWRENCE, C.	M
LICCIARDELLO, M.	F
LOPEZ, E.	M
LORUSSO, E.	F

LOTTI, M.	F
LOWELL, M.	F
MAC DONALD, J.	F
MAINENTI, A.	F
MANUELIAN, M.	F
MANZI, R.	F
MARCHESE, M.	M
MARIANI, A.	F
MARIOTTI, G.	M
MARTINELLI, V.	M
MARTORI, A.	F
MARZELLA, C.	M
MASSIE, L.	F
MATTIA, J.	M
MELI-GRISANZIO, A.	F
MICHAEL, S.	M
MIOLOVIC, T.	F
MIRO, R.	F
MOELLER, A.	M
MURA, S.	M
N'DIAYE, I.	M
NOTO, G.	M
OKSUZ, D.	M
OLIVA, F.	M
O'NEILL, T.	M
ORLANDO, G.	M
PACIS, V.	F
PAOLANTONIO, S.	F
PARADISI, W.	M
PASQUALONE, E.	M
PATTI, T.	F
PERISSI	M
PERSICO, D.	F
PETRILLO, O.	M
PICONE, R.	M
PILLONI, A.	M
PITANZA, C.	F
PREVID, L.	F
PURPURA, S.	F
QUAGLIA, S.	F
RACLI, J.	F
RAHI, A.	F
RASIZZI, C.	M
RICHARDS, C.	F
RUSSO, A.	M
SALLUSTI, G.	M
SANGIAMO, R.	F
SANTANA, M.	F
SAVELLA, N.	M
SCIARRINO, F.	F
STRINO, P.	M
SWINTON, N.	F
TAMAYO, C.	F
TEDESCO, C.	M
TURCHI, C.	F
TYBURSKI, J.	F
VALENTINO, A.	M
VALLS, M.	F
VEGA, M.	F
VELAZQUEZ, M.	F
VILLALTA, E.	F

VISONE, S.	M
VOLI, M.	M
WENDT, K.	F
WULFF, C.	M
ZAGARI, A.M.	F
ZAZZI, M.	F

Schedule C: Name, Title, Date of Hire, Age at Hire and Sex of Employees Hired in Alitalia's New York Office Between January 1, 2004 and December 31, 2007 (Asterisk Indicates Subsequent Termination)

NAME	TITLE	BIRTH DATE	HIRE DATE	AGE AT HIRE	SEX
Allessio, C.	Sales Planning Assistant	5/21/1982	5/1/2006	24	M
Caputo, M.	Executive Assistant	5/19/1967	5/1/2007	40	F
Falleroni, S.	Sales Support in-house Analyst	11/4/1982	7/16/2007	25	F
Fontanilla, R.*	Business Quality Analyst/CGO	2/23/1977	12/16/2004	27	M
Green, D.	Trade Marketing Assistant	8/29/1984	6/16/2006	22	M
La Cenera, A.*	Budget & Cost Control Analyst	12/3/1979	1/24/2005	26	F
Landini, D.	Director Administration/NAM	1/30/1970	10/16/2006	36	M
Milovic, T.*	Mgr. Employee Relat. & Organiz. Developm.	8/3/1974	4/3/2006	32	F
Mura, S.*	Marketing Analyst/CGO	10/13/1959	4/17/2006	47	M
Oishi, C.	Corporate Sales Consult.	7/30/1980	9/1/2005	25	M
Oksuz, D.*	Cashier	8/10/1973	12/16/2004	31	M
Oliva, F.*	Accounts Control Rep.	11/26/1953	5/1/2007	54	M
Quagila, S.*	Statistical Analyst	9/12/1981	6/26/2006	25	F
Rahi, A.*	Tariffs Analyst	4/27/1975	6/1/2006	31	F
Reyes, N.	Group Desk Rep.	10/24/1980	5/1/2007	27	F
Rocha, M.	Customer Relations Rep.	12/13/1982	3/16/2007	25	F
Strino, P.*	Director, Regulatory Affairs	9/13/1975	5/1/2007	32	M
Ucker, K.*	Marketing Analyst/CGO	3/21/1977	12/1/2004	27	M
Valls, M.*	Cash Management Rep.	8/28/1958	6/1/2006	48	F
Villalta, E.*	Internet Sales Rep.	8/10/1979	5/1/2006	27	F
Wulff, C.*	Corp. Support Unit Rep.	9/24/1979	8/1/2005	26	M
Yang, N.	Sales Analyst	8/2/1975	10/1/2007	32	F

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07 CV 3583

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Tina Fossetta, being duly sworn, deposes and says:

1. I am over the age of eighteen years and not a party to this action, and reside in Queens, New York.

2. On April 21, 2008, I caused the within **DEFENDANT'S RESPONSE TO PLAINTIFF'S SECOND SET OF INTERROGATORIES** to be served upon plaintiff by causing a true copy of same, enclosed in an envelope addressed as shown below, to be delivered by overnight courier to:

Robert Ottinger, Esq.
Carolyn Horan, Esq.
The Ottinger Firm, P.C.
19 Fulton Street, Suite 408
New York, New York 10038
Attorneys for Plaintiff Ester Lorusso


Tina Fossetta

Sworn to and subscribed before me
this 21st day of April, 2008


Notary Public

NANCY J. NEUBAUER
Notary Public, State of New York
No. 01NE5041602
Qualified in New York County
Commission Expires April 10, 2011